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*Proposed Counsel to the Official Committee of
Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	Chapter 11
In re:)	
)	Case No. 22-10910-SHL
Madison Square Boys & Girls Club, Inc.,)	
)	(Jointly Administered)
Debtor. ¹)	
_____)	

**CERTIFICATION OF NO OBJECTION OF
CERTAIN ENTITIES RELATING TO MOTION
OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004 AUTHORIZING EXAMINATIONS AND
PRODUCTION OF DOCUMENTS OF CERTAIN INSURERS**

¹ The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, the undersigned counsel for the Official Committee of Unsecured Creditors (the “Committee”) hereby certifies as follows:

1. On August 9, 2022, the Committee filed the *Motion of the Official Committee of Unsecured Creditors for Entry of an Order Pursuant to Bankruptcy Rule 2004 Authorizing Examinations and Production of Documents of Certain Insurers* [Docket No. 111] (the “Rule 2004 Motion”).

3. The Rule 2004 Motion was served on **August 9, 2022** [Docket No. 114].

4. The objection deadline (the “Objection Deadline”) for the Rule 2004 Motion was **August 25, 2022 by 4:00 p.m. (ET)** pursuant to the Order at Docket No. 120. As of the filing of this *Certification of No Objection*, more than forty-eight (48) hours have elapsed since the Objection Deadline and, to the best of my knowledge, the following subset of entities that were served with the Rule 2004 Motion have not filed a responsive pleading to the Rule 2004 Motion on the docket of the above-captioned chapter 11 case and have not served the Committee with any such responsive pleading: A.G. Risk Management Inc.; Allianz Global Risks US Insurance Company; Argonaut Insurance Co.; Atlantic Specialty Insurance Company; Chubb Group Holdings, Inc.; Church Mutual Insurance Company, S.I.; General Star Indemnity Company; Great American Insurance Company; Great Atlantic Insurance Company; Hallmark Specialty Insurance Co.; Magna Carta Companies, Inc. Philadelphia Indemnity Insurance Company; Planet Insurance Company; Premia Holdings, Ltd.; Public Service Mutual Insurance Company; Reliance Insurance; RSUI Group, Inc.; Seaboard Surety; StarStone Specialty Insurance Co.; Travelers Casualty and Surety Company, Inc.; and other insurers (excluding the Objecting

Parties) identified by the Committee which potentially may provide coverage in connection with sexual abuse claims asserted against the Debtor.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: August 29, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Gillian N. Brown

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